

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

Loramax LLC, *Plaintiff*,

v.

Frontier Airlines, Inc., *Defendant*.

Civil Action No. 2:15-cv-00752-RWS-RSP

**[UNOPPOSED MOTION]**

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**[UNOPPOSED] PLAINTIFF LORAMAX LLC'S MOTION FOR  
EXTENSION OF TIME TO RESPOND TO DEFENDANT  
FRONTIER AIRLINES, INC.'S MOTION TO DISMISS FOR  
FAILURE TO STATE A CLAIM**

Plaintiff Loramax LLC ("Loramax") hereby requests that the Court enter an Order extending the deadline by fifteen (15) days for Plaintiff to respond to Defendant Frontier Airlines, Inc.'s ("Defendant") motion to dismiss for failure to state a claim (Dkt. No. 13; filed on September 8, 2015) in the above captioned case. The current deadline is September 25, 2015, and the new deadline would be October 10, 2015.

Good cause exist her because, *inter alia*:

- (1) Defendant does not oppose this extension;
- (2) Loramax needs to analyze the large number of § 101 motions filed (about 27 in all the Loramax cases), which are very serious in nature;
- (3) Loramax needs additional time to confer with its consultant/expert and draft an expert declaration;
- (4) Loramax needs additional time to meet and confer with all defendants regarding their claim construction positions, infringement positions, and factual positions;
- (5) Loramax needs additional time to seek expedited discovery if necessary;

- (6) lead counsel for Loramax, Mr. Jaspal S. Hare, was on vacation from September 18-20, 2015;
- (7) Plaintiff has expended significant resource responding to Defendant GEICO's motion to transfer venue (C.A. No. 2:15-cv-665, Dkt. No. 14);
- (8) Loramax requires the additional time to draft the about 27 responses; and
- (9) this request is not made for the purposes of delay.

Accordingly, good cause exists for granting this motion. A proposed order granting this unopposed motion is attached.

DATED September 23, 2015.

Respectfully submitted,

*/s/ Jaspal S. Hare*  
By: \_\_\_\_\_

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**ATTORNEYS FOR PLAINTIFF  
LORAMAX LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on Wednesday, September 23, 2015 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jaspal S. Hare  
Jaspal S. Hare